

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

Row Vaughn Wells, Individually and as Administratrix of the Estate of Tyre Deandre Nichols, Deceased,))
))
))
Plaintiff,))
)	
v.)	CASE NO. 2:23-CV-02224
)	JURY DEMAND
The City of Memphis, Tennessee; Chief Cerelyn Davis; Emmitt Martin III; Demetrius Haley; Justin Smith; Desmond Mills, Jr.; Tadarrius Bean; Preston Hemphill; Robert Long; JaMichael Sandridge; Michelle Whitaker; DeWayne Smith,))
))
Defendants.))

STATUS UPDATE REGARDING PLAINTIFF'S REQUEST NO. 133

Defendant City of Memphis (the “City”), pursuant to the Court’s April 14, 2025 Order Following Hearing (ECF No. 388), hereby updates the Court as to its efforts related to Plaintiff’s Request for Production No. 133.

Counsel for the City and relevant Memphis Police Department (“MPD”) personnel have been working diligently over the last week to come up with a plan for production of the videos and Related Information¹ for the approximately 880 incidents identified from the DOJ’s Evidence.com audit trails.

¹ “Related Information” was defined by the Court to include documents and information associated with an incident. (ECF No. 388, PageID 5808.)

For the videos stored in Evidence.com, MPD is working to make the videos accessible via a unique link for each incident. The parties will be able to view and download the videos from these links. MPD is working to add bates labels to the videos, which will save time and resources normally spent transmitting the information to counsel for review and production. The videos will be produced without redactions and, thus, will be produced with the **Confidential** designation.

For the Related Information, MPD is compiling the documents for each of the approximately 880 incidents, and counsel for the City has been working to identify any Related Information it has already produced so that efforts are not duplicative. As MPD identifies additional responsive Related Information, those documents will be transmitted to counsel for the City, and we will review and produce the documents to the parties, as done in the normal course of discovery.

MPD estimates that production of all videos and Related Information will likely be completed within ninety days. The City estimates it can make its first production in two weeks. The City will thereafter continue its production on a rolling basis.

Dated: April 18, 2025

Respectfully submitted,

**BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, P.C.**

s/ Bruce McMullen

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*Attorneys for Defendant City of Memphis,
Chief Cerelyn Davis in her Individual
Capacity, and Dewayne Smith as Agent of
the City of Memphis*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing has been served upon all counsel of record and the Guardian Ad Litem via the Court's electronic filing system on April 18, 2025.

s/ Bruce McMullen

Bruce McMullen